

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	}	JUDGE BENITA PEARSON
	}	
Plaintiff,	}	
v.	}	CASE NO.: 20cr780
	}	
ANDREY KOVALENKO,	}	MOTION TO APPOINT EXPERT
	}	
Defendant.	}	

Now comes the Defendant, by and through his attorney, and hereby moves the Court to David Tantlinger, CPA, CFE, CFF, as a forensic accountant to serve as an expert in this matter. As previously indicated, this case arises from allegations that the Defendant embezzled approximately \$270,000 from several churches over a period of three years. The government has provided discovery, which is extensive: there are nearly 10,000 pages of bank records, witness statements, invoices, and other documents.

Counsel has made every effort to review the discovery, but submits that counsel's limited financial background makes the assistance of a forensic accountant essential to assure effective representation of the Defendant. Mr. Tantlinger has served as an expert in Federal cases before, as attested to by his contract with the Federal Public Defenders' Office, attached hereto as Exhibit "A." Counsel has also worked with Mr. Tantlinger on another case, and found his assistance invaluable. A copy of Mr. Tanglinger's curriculum vitae is attached as Exhibit "B."

For the foregoing reasons, Defendant respectfully requests that the Court appoint David Tantlinger as a financial expert for the defense in this matter.

Respectfully submitted,

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies a copy of the foregoing motion has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/Russell S. Bensing
Russell S. Bensing

ATTORNEY FOR DEFENDANT